

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

**CATHOLIC LEGAL IMMIGRATION
NETWORK, INC., et al.,**

Plaintiffs,

V.

Civil Action No. 8:20-cv-02042-TDC

**UNITED STATES CITIZENSHIP AND
IMMIGRATION SERVICES, et al.,**

Defendants.

JOINT STATUS REPORT

In accordance with the parties' proposal to submit a joint status report on a monthly basis, as stated in their Joint Motion to Stay All Proceedings filed on September 28, 2020 (ECF No. 18 at 6), the parties, by and through undersigned counsel, hereby file this Joint Status Report, and state as follows:

1. Catholic Legal Immigration Network, Inc., Alianza Americas, and National TPS Alliance (Plaintiffs) commenced the instant action against the United States Citizenship and Immigration Services (USCIS), United States Department of Homeland Security (DHS), and United States Department of State (State), (collectively, Defendants) to compel compliance with the Freedom of Information Act (FOIA). Specifically, the Complaint seeks responses to three separate FOIA requests submitted to USCIS (“Request 1”), State (“Request 2”), and DHS (“Request 3”) respectively. (Compl. ¶¶ 27-40.)

2. On May 6, 2021, USCIS produced its seventh rolling release of documents comprised of 15 pages and 335 partially produced pages from the Office of Policy and Strategy component (OP&S) to Plaintiffs in response to Request 1. USCIS is presently processing the eighth production of USCIS pages. Subject to FOIA exemptions, the eighth production of

USCIS pages is expected to be produced on or about June 7, 2021. Per the request of Plaintiffs, the eighth production will consist of responsive, non-FOIA exempt documents from OP&S.

3. State produced its fifth rolling release on April 16, 2021 comprised of 27 records released in part. State is continuing to collect unclassified potentially responsive documents. The sixth production of responsive, non-exempt material, to the extent any such material is identified, will be made on or before May 17, 2021. While searches for records on classified systems continue to be inhibited by the ongoing impact of COVID-19 mitigation measures on staffing, State will initiate searches of classified systems promptly upon the relevant employees re-obtaining access to those systems.

4. The parties are continuing to engage in discussions regarding the possible narrowing or prioritization of Plaintiffs' FOIA requests.

Dated: May 17, 2021

Respectfully submitted,

/s/
Khaled Alrabe
Amber Qureshi
National Immigration Project of the
National Lawyers Guild
2201 Wisconsin Ave., NW Suite 200
Washington, DC 20007
Tel: (510) 679-3994
alrabe@nipnl.org
amber@nipnl.org

_____/s/_____
Victoria Neilson
Michelle N. Mendez
Catholic Legal Immigration Network (CLINIC)
8757 Georgia Ave., Suite 850
Silver Spring, MD 20910
Tel: (540) 907-1761
Fax: (301) 565-4824
vneilson@cliniclegal.org
mmendez@cliniclegal.org

Jonathan F. Lenzner
Acting United States Attorney

_____/s/_____
Kimberly S. Phillips
Assistant United States Attorney
36 S. Charles St., 4th Flr.
Baltimore, MD 21201
Tel: (410) 209-4800
Kimberly.Phillips@usdoj.gov